

Unbundling for FTTH and FTTC networks

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Key Issues

Proposed rule, section 51.219(a)(3)

(3) Fiber-to-the-Home loops. A fiber to the home loop is a local loop consisting entirely of fiber optic cable, whether dark or lit, and serving a terminal, at, or within 500 feet of, an end user's customer premises.

"Bright Line"

- "Bright Line" is preserved in FTTC and/or FTTH
- Same demarc location for both architectures
- Same CPE interfaces for both architectures
- Only difference is how much distance, up to 500 feet, exists between O/E conversion and demarc
- Loop administration and inventory tools can readily identify loop types

Service Parity

- Capacity of the fiber medium is essentially limitless
- Some amount of metallic medium used in both FTTH and FTTC
- Bandwidth delivery is practically the same for both architectures; FTTC can support >5Gb/s (Coax) and 150Mb/s (Twisted Pair) over 500 feet, as even the Association for Local Telecommunications Services (ALTS) acknowledges in its FCC ex-parte submission, Jan 23, 2004



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- Competitive Impairment
 - Standard is met with both architectures
- FTTPremise definition
 - Includes Fiber-to-the-Home (FTTH) and Fiber-to-the-Curb (FTTC)
- Multi-Dwelling Unit (MDU) / Multi-Tenant Unit (MTU) solution
 - Represent significant percentage of customers
 - FTTC and FTTH MDU applications are identical; ONT location is same as ONU location; service provider frequently doesn't own intra-building wiring



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Network Engineering Differences (FTTC vs. FTTH)

Powering

- Network powering vs. home powering
- Centralized battery backup vs. distributed batteries
- Service provider ownership and management vs. customer owned and managed

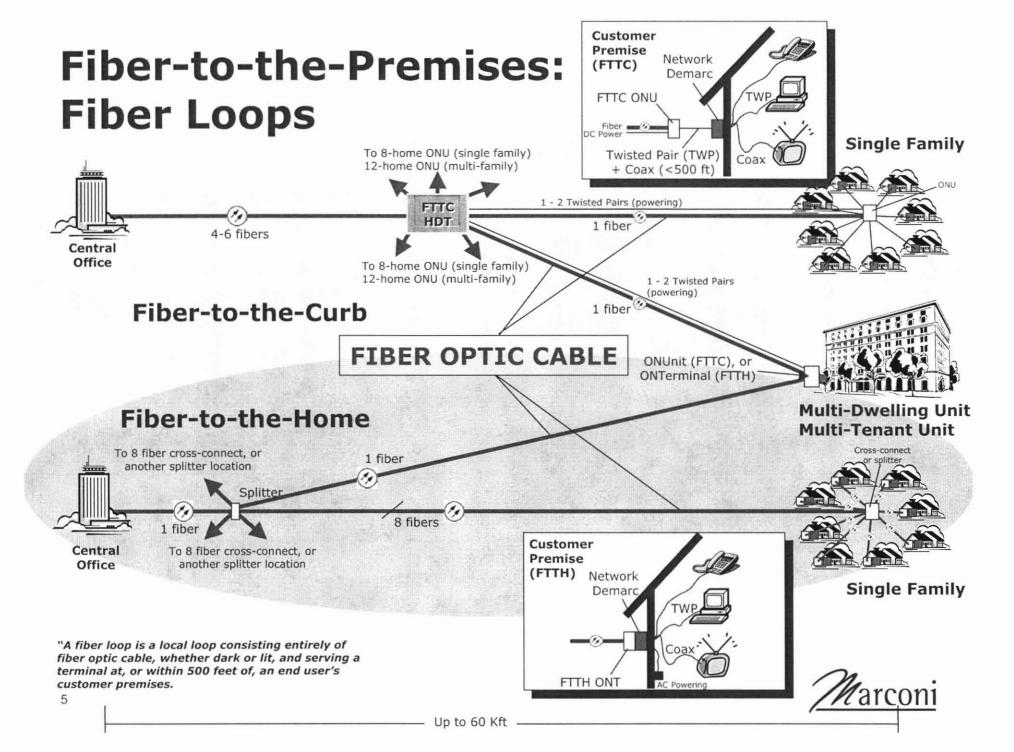
Bandwidth Sharing

One fiber shared by 8 - 12 homes vs. one fiber shared by 32 homes

Electronic Points of Failure

 O/E and powering conversion shared by 8-12 users vs. O/E, powering dedicated, and replicated, for every user





Other Hybrid Loops

